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Of Counsel

September 2, 2010

Office of General Counsel
Federal Election Commission
999 E Street NW
Washington DC, 20463

MUR # 6313

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FEDERAL ELECTION
COMMISSION
2010 SEP 13 AM 11:26
OFFICE OF GENERAL
COUNSEL

**Complaint of Darren Tobolt against Collett for Congress (HOMN04148),
Fred Meyer, Treasurer and Teresa Collett**

Dear Sir or Madam,

I represent Darren Tobolt, a citizen of and registered voter in the 4th Congressional District of Minnesota. His address is St. Paul, Minnesota 55102.

My client hereby submits this complaint (original and 3 copies) against Teresa Collett, Republican candidate for the United States House of Representatives for the Fourth Congressional District of Minnesota, Collett for Congress (her principal campaign committee), and Fred Meyer, its treasurer, Respondents. Because of the extensive and repeated violations of law committed by Ms. Collett and her principal campaign committee, my client requests expedited consideration of this complaint.

The clear violations to date are:

First, failure to file a Statement of Organization in the timely manner required by 2 U.S.C. § 432 and 433. Attached are sample copies of some of Ms. Collett's Facebook and website statements and campaign activities for the period of January 30 to May 25, 2010, showing her 2010 actions as a candidate.

However, FEC records show that candidate Collett did not file her Statement of Organization until April 20, 2010 and did not file a completed and accurate Statement of Organization until August 17, 2010. My client requests that an investigation be commenced and that Respondent be fined for such a clear and flagrant violation of law.

First Quarter contributions to Collett for Congress were \$6,157.00 and First Quarter Disbursements were \$1,045.35. This leaves a net on hand of \$5,111.65 which is the precise amount shown on the July 15 Report and is in excess of the \$5,000 statutory reporting threshold.

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In addition, there appears to have been a disbursement of an additional \$1,508 that was incurred by individuals or on a credit card, but paid in the second quarter.

Please also note that during the first quarter of 2010, Ms. Collett received contributions of at least \$6,157, but did not timely report the same. Indeed, the filings to date, as shown on the Second Quarter report, still do not show the unreported first quarter activities.

Second, the FEC website as of August 20, 2010 shows a failure by candidate Collett and her committee to file the required First Quarter Report at all.

Third, the FEC website as of August 20, 2010 shows that candidate Collett still has not filed her Statement of Candidacy (FEC Form 2).

Fourth, other deficiencies are:

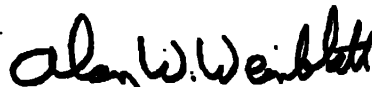
1. Failure to disclose full information on contributors. Of 35 itemized individuals, Respondents failed to completely identify 16 contributors, (46%). 2 U.S.C. § 432.
2. Failure to disclose the true and complete purpose of disbursements to individuals and vendors:

--Patrick Davis, Jih Vujovich and Susan Smith are listed vaguely as consulting fees.

--Vendors Service Plus, Council for National Policy, and several reimbursements to individuals are inadequately described merely as "supplies" and "convention."

All of the foregoing facts are ascertained from the FEC website and/or other public websites.

Based on the above flagrant violations of elementary FEC reporting and disclosure requirements, Ms. Collett's campaign committee and its Treasurer should be fined as required by law.



ALAN W. WEINBLATT
FOR
WEINBLATT & GAYLORD, PLC
Attorney for Complainant Darren Tobolt

AWW:kq
Encl.
cc: Darren Tobolt

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STATE OF MINNESOTA)
)ss.
COUNTY OF RAMSEY)


I, Darren Tobolt, being first duly sworn, deposes and says:

1. I am the complainant in the within complaint and have fully read the above complaint.
2. The statements alleged in my complaint have been ascertained from the FEC website and other public websites.
3. All of the factual statements are true and correct based upon those sources of information.

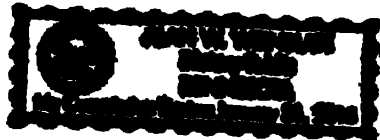


Darren Tobolt

Subscribed and sworn to before me,
this 2nd day of September, 2010.



Notary Public



**Evidence for Complaint of Darren Tobolt against Collett for Congress
(HOMN04148), Fred Meyer, Treasurer and Teresa Collett**

1. Twitter posting: Just posted a note "Who I am and Why I can Win" on my facebook page. Check it out! 10:46 AM Jan 30th via web (copy attached)
2. Twitter posting: Here is the URL for my campaign Facebook page - <http://tiny.cc/Collett> 8:40 PM Jan 30th via web (copy attached)
3. Twitter posting: Teresa Collett for Congress on Facebook has over 300 fans in just three days! 11:51 PM Feb 1st via web (copy attached)
4. Twitter posting: Let's caucus - the first step to a victory in November! 6:54 PM Feb 2nd via web (copy attached)
5. Twitter posting: Thanks for everyone that showed up tonight for the party caucus and a special thanks to the folks who went to support me! 11:31 PM Feb 2nd via web (copy attached)
6. Twitter posting: Sixth day of campaign - 360 Facebook fans, numerous BPOU delegates, first donor maxed out on his contribution! <http://tiny.cc/Collett387> 7:38 PM Feb 3rd via web (copy attached)
7. Twitter posting: I have just received the support of Sen. Norm Coleman for the endorsement of MN GOP to run against Betty McCollum. Thank you Senator! Friday, February 05, 2010 1:08 PM via web (copy attached)
8. Twitter posting: Just added our 500 fan on facebook! Momentum is building. We can beat Betty this fall! Sunday, February 28, 2010 10:28 PM via web (copy attached)
9. Twitter posting: First Sen. Coleman endorses me, now two former MN statewide GOP chairs, LoAnne Thrane & Bob Brown, join my campaign team. We can win in 2010. Friday, March 05, 2010 9:44 AM via web (copy attached)
10. Twitter posting: "Come out and play Betty!" My invitation to debate via video being recorded by the DFL camera man at the CD 4 candidates' forum tonight. Thursday, March 18, 2010 11:53 PM via web (copy attached)
11. Twitter posting: I am so grateful to the volunteers who turned out tonight to address envelopes and make phone calls. Thank you! Monday, March 29, 2010 11:21 PM via web (copy attached)

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12. Twitter posting: Check out my new video on limited government at <http://www.youtube.com/watch?v=-6kvehDj-k>. Saturday, April 10, 2010 9:17 AM via web (copy attached)
13. Twitter posting: Filing as a candidate at 8:30 this morning. Just one more step toward winning in November. Tuesday, May 25, 2010 7:30 AM via web (copy attached)
14. FEC Statement of Organization for Teresa Collett for Congress dated 4/20/10 (see FEC website)
15. FEC Request for Additional Information dated 6/17/10 (copy attached)
16. FEC Amended Statement of Organization for Teresa Collett for Congress dated 6/21/10 (see FEC website)
17. FEC 48 Hour Contribution Notice dated 8/5/10 (see FEC website)
18. FEC 48 Hour Contribution Notice dated 8/6/10 (see FEC website)
19. FEC 48 Hour Contribution Notice dated 8/10/10 (see FEC website)
20. FEC Amended Statement of Organization for Teresa Collett for Congress dated 8/17/10 (see FEC website)
21. FEC July Quarterly Report for Teresa Collett for Congress dated 7/15/10 (see FEC website)
22. FEC Amended July Quarterly Report for Teresa Collett for Congress dated 7/20/10 (see FEC website)

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Just posted a note "Who I am and Why I can Win" on my facebook page. Check it out!
[10:46 AM Jan 30th via web](#)



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Here is the URL for my campaign Facebook page - <http://tiny.cc/Collett> 8:40 PM Jan 30th via web



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Teresa Collet for Congress on Facebook has over 300 fans in just three days! 11:51 PM
Feb 1st via web



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Let's caucus - the first step to a victory in November! 6:54 PM Feb 2nd via web



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Thanks for everyone that showed up tonight for the party caucus and a special thanks to the folks who went to support me! 11:31 PM Feb 2nd via web



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Sixth day of campaign - 360 Facebook fans, numerous BPOU delegates, first donor maxed out on his contribution! <http://tiny.cc/Collett387> 7:38 PM Feb 3rd via web



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I have just received the support of Sen. Norm Coleman for the endorserment of MN GOP to run against Betty McCollum. Thank you Senator! 1:08 PM Feb 5th via web



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Just added our 500 fan on facebook! Momentum is building. We can beat Betty this fall! [10:28 PM Feb 28th via web](#)



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First Sen.Coleman endorses me, now two former MN statewide GOP chairs, LoAnne Thrane & Bob Brown, join my campaign comm. We can win in 2010. 9:44 AM Mar 5th via web



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"Come out and play Betty!" My invitation to debate via video being recorded by the DFL camera man at the CD 4 candidates' forum tonight. 11:53 PM Mar 18th via web



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I am so grateful to the volunteers who turned out tonight to address envelopes and make phone calls. Thank you! 11:21 PM Mar 29th via web



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Check out my new video on limited government at <http://www.youtube.com/watch?v=6kpehDj-k> 9:17 AM Apr 10th via web



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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-1

June 17, 2010

Robert H. Collett, Treasurer
Teresa Collett for Congress Campaign
1824 Stanford Avenue
St. Paul, MN 55105

Response Due Date:
July 22, 2010

Identification Number: C00481424

Reference: Filing received 4/20/2010

Dear Treasurer:

You have failed to file a complete Statement of Organization (FEC FORM 1). Please resubmit a Statement of Organization for your committee, including pages 1 and 2, to the Commission by the response date noted above.

2 U.S.C. § 433 requires committees to register with the Commission within ten (10) days of becoming a political committee. (See also 2 U.S.C. § 431(4)) The Statement of Organization must provide the following information: committee's full name and complete address, e-mail address and/or fax number, committee type, name(s) of any connected organization or affiliated committee(s), the name, address and position of the custodian of books and accounts, the name and address of the treasurer and a listing of all banks, safety deposit boxes or other depositories used by the committee. In addition, this Statement must be signed and dated by the committee treasurer or his/her designated agent. A copy of FEC FORM 1 can be downloaded from the FEC website at <http://www.fec.gov>, or requested through the FEC Faxline at (202) 501-3413.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. Requests for extensions of time in which to respond will not be considered.

If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at

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the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1395.

Sincerely,

Benjamin J. Holly

Benjamin J. Holly
Campaign Finance Analyst
Reports Analysis Division

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